

DANIEL G. BOGDEN  
United States Attorney  
333 South Las Vegas Blvd.  
Lloyd George Federal Building  
Las Vegas, Nevada 89101  
(702) 388-6336

ANDY R. CAMACHO  
Trial Attorney, Tax Division  
U.S. Department of Justice  
P.O. Box 683  
Ben Franklin Station  
Washington, D.C. 20044-0683  
(202) 307-1481  
andy.r.camacho@usdoj.gov

Attorneys for the United States of America

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

RUNVEE, INC.

Plaintiff,

v.

UNITED STATES OF AMERICA,

Defendant.

Civil No.: 2:10-cv-2260-KJD-GWF

**UNITED STATES' UNOPPOSED  
MOTION FOR EXTENSION OF TIME  
(FIRST REQUEST)**

The United States of America, by and through its undersigned counsel, hereby moves the Court pursuant to Fed. R. Civ. P. 6(b) and Local Rule 6-1 for an extension of time until Thursday, April 21, 2011 in which to file a response to the complaint filed by Plaintiff Runvee, Inc. ("Plaintiff") in the above-captioned case.

1. On December 30, 2010, Plaintiff filed its complaint (See Dkt. No. 1), which was served on the United States Attorney's Office for the District of Nevada on January 4, 2011.

1           2. The United States Department of Justice, Tax Division first received a copy of the Plaintiff's  
2 complaint on January 5, 2011. Shortly thereafter, the undersigned counsel requested that the Internal  
3 Revenue Service ("IRS") forward its administrative file and views concerning this matter to the  
4 Department of Justice, Tax Division. The administrative file provides information pertaining to the  
5 Notices of Federal Tax Liens filed with the Clark County Recorder, State of Nevada and which concern  
6 the parcels at issue in this action.

7           3. The IRS provided its views on March 3, 2011, and now the undersigned counsel is awaiting  
8 the receipt of the administrative file. The undersigned counsel expects to receive the administrative file  
9 within the next two to three weeks.

10          4. Without the documents requested from the IRS, the United States is unable to fully and  
11 accurately respond to the allegations in the Plaintiff's complaint.

12          5. In light of the fact that the Department of Justice does not yet have the IRS administrative file  
13 regarding this case, the United States respectfully requests an extension of the existing response deadline  
14 until Thursday, April 21, 2011 in which to file a response to the complaint in this case.

15          6. This motion is not made for the purpose of delay, but only to allow the Department of Justice  
16 and the IRS to coordinate the defense of this matter and to allow the United States to respond fully and  
17 accurately to the complaint.

18          7. By moving for an extension of time, the United States does not waive any defenses listed in  
19 the Fed. R. Civ. P. 12(h).

20          8. The undersigned counsel conferred with Plaintiff's lead counsel, Jay Weill of Sideman &  
21 Bancroft LLP, regarding the proposed relief, and he indicated that Plaintiff has no opposition to such  
22 relief.

23          9. This is the first request for an extension of time to respond to the complaint.

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1 WHEREFORE the United States respectfully moves the Court to issue an order granting the  
2 United States an extension of time, until Thursday, April 21, 2011 to respond to the complaint and  
3 granting any other relief to which the United States may be entitled.


4  
5 Respectfully submitted this 4<sup>th</sup> day of March, 2011

6  
7 /s/Andy R. Camacho  
8 ANDY R. CAMACHO  
9 Trial Attorney, Tax Division  
10 U.S. Department of Justice  
11 Attorneys for the United States

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13 Upon Motion of the United States, and for good cause shown, it is hereby ORDERED, pursuant  
14 to Fed. R. Civ. P. 6(b) and Local Rule 6-1 that the deadline to file a response to the complaint is  
15 extended until Thursday, April 21, 2011.

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18 IT IS SO ORDERED:

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21 GEORGE FOLEY, JR.  
22 United States Magistrate Judge

23 DATED: \_\_ March 7, 2011 \_\_  
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**CERTIFICATE OF SERVICE**

IT IS HEREBY CERTIFIED that service of the foregoing **UNITED STATES' UNOPPOSED MOTION FOR EXTENSION OF TIME (FIRST REQUEST)** has been made this 4th day of March, 2011, via the Court's CM/ECF system to the following:

Peter S. Christiansen, Esq.  
CHRISTIANSEN LAW OFFICES  
9910 West Cheyenne Ave., Suite 110  
Las Vegas, Nevada 89129  
[pchristiansen@christiansenlaw.com](mailto:pchristiansen@christiansenlaw.com)  
Attorneys for Plaintiff

/s/Andy R. Camacho  
ANDY R. CAMACHO  
Trial Attorney, Tax Division  
U.S. Dept. of Justice